

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION**

**Patrick-Joseph: Groulx**

Plaintiff/Prosecutor

Vs.

1:22-cv-12296

Judge: Ludington, Thomas L.

MJ: Morris, Patricia T.

Filed: 09-27-2022

**CSX CORPORATION aka CSX TRANSPORTATION, PAN AM RAILWAYS, BOSTON AND MAINE RAILROAD, PAN AM SOUTHERN, TTX COMPANY, RAILBOX, SPRINGFIELD TERMINAL RAILWAY CO., WESTERN AND ATLANTIC RAILROAD, ALLEGHENY & WESTERN, CSX DE MEXICO, CLEVELAND SHORTLINE RAILWAY, CYBERNETICS & SYSTEMS, CSX CONTAINER LEASING, CSX CAPITAL TRUST, CSX TRADE RECEIVABLES, QUALITY CARRIERS, THE ATLANTIC LAND AND IMPROVEMENT COMPANY, CSX MINERALS, CSX WORLD TERMINALS INFRASTRUCTURE LIMITED, CSX TECHNOLOGY, MID ALLEGHENY, CSX CAPITAL TRUST 1, BALTIMORE & CUMBERLAND VALLEY RAILROAD EXTENSION COMPANY, CSX INTERMODAL TERMINALS, TOTAL DISTRIBUTION SERVICES, TRANSFLO, CONRAIL, NEW YORK CENTRAL LINES, CONSOLIDATED RAIL CORPORATION, TRANSFLO TERMINAL SERVICES, FRUIT GROWERS EXPRESS, CONRAIL SHARED ASSETS OPERATIONS** civilly, fraudulently, neglectfully, corporately, personally, and tortuously,

**NORFOLK SOUTHERN** civilly, fraudulently, neglectfully, corporately, personally, and tortuously,

**QUALITY DISTRIBUTION** civilly, fraudulently, neglectfully, corporately, personally, and tortuously,

DEFENDANTS.

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**COMPLAINT**

**I. PARTIES OF THE COMPLAINT AND THEIR CONTACT INFORMATION**

- A.** Patrick-Joseph: Groulx is the Plaintiff and the Prosecutor who resides in Saginaw Michigan at 2070 Houlihan Road with a contact number of 989 860-2550 and an email of mr.288074@yahoo.com.

- B. **CSX CORPORATION** aka CSX TRANSPORTATION, PAN AM RAILWAYS, BOSTON AND MAINE RAILROAD, PAN AM SOUTHERN, TTX COMPANY, RAILBOX, SPRINGFIELD TERMINAL RAILWAY CO., WESTERN AND ATLANTIC RAILROAD, ALLEGHENY & WESTERN, CSX DE MEXICO, CLEVELAND SHORTLINE RAILWAY, CYBERNETICS & SYSTEMS, CSX CONTAINER LEASING, CSX CAPITAL TRUST, CSX TRADE RECEIVABLES, QUALITY CARRIERS, THE ATLANTIC LAND AND IMPROVEMENT COMPANY, CSX MINERALS, CSX WORLD TERMINALS INFRASTRUCTURE LIMITED, CSX TECHNOLOGY, MID ALLEGHENY, CSX CAPITAL TRUST I, BALTIMORE & CUMBERLAND VALLEY RAILROAD EXTENSION COMPANY, CSX INTERMODAL TERMINALS, TOTAL DISTRIBUTION SERVICES, TRANSFLO, CONRAIL, NEW YORK CENTRAL LINES, CONSOLIDATED RAIL CORPORATION, TRANSFLO TERMINAL SERVICES, FRUIT GROWERS EXPRESS, CONRAIL SHARED ASSETS OPERATIONS has a headquarters in Florida at 500 Water Street, 15th Floor Jacksonville, FL 32202 with a contact number of 904 359-3200.
- C. NORFOLK SOUTHERN has a headquarters at 1200 Peachtree St NE Atlanta GA 30309 with a contact number of 1 800 742-6313
- D. QUALITY DISTRIBUTION has ahead quarters at 1208 E Kennedy Blvd UNIT 132, Tampa, FL 33602 and with contact number of 1 877 967-5472

## **II. JURISDICTION AND VENUE**

Jurisdiction and Venue is proper for this pursuant to 28 USC § 1332 pursuant to THE PARTIES OF THE COMPLAINT (See Roman Numeral I of this Complaint)

## **III. TERMS OF THE COMPLAINT**

- a. If Defendants fail to Object to any of the terms inscribed here, defendants lose their right to argue the terms and lose their right to argue any term not objected to in an appeal.
- b. Every Objection must be separate from the Answer; an Objection is not an answer to a complaint.
- c. Every Objection for a term is a separate objection, 2 or more terms cannot be combined in a single objection, each term being objected to must be a different filing.

- d. Failure to Object to any term will leave a door open for a motion for an order reflecting the terms to be enforced in this suit.
- e. The Plaintiff, the Court and the Judge and/or Magistrate Judge are not bound to these terms.
- f. Defendant cannot file a summary disposition unless it is used to fix a defective document.
- g. Defendants cannot file a motion to dismiss.
- h. Plaintiff will have the right to amend his Complaint as needed to the 12<sup>th</sup> time.
- i. Defendants are not allowed to Sanction Plaintiff.
- j. Defendants cannot file a motion for Sanctions.
- k. Defendants cannot deem this action as frivolous.
- l. Plaintiff only has to prove injury, harm or loss, nothing more and nothing less.

#### **IV. NATURE OF THE ACTION**

Plaintiff brings this action against Defendant-A for fraudulently neglecting to fix the railways in Saginaw Michigan that has cost Plaintiff 2 vehicles now where the suspension, sway bars, and front ends, have been damaged from driving over railways in Saginaw, on top of that if Plaintiff's vehicle is being damaged and so are fire and police vehicles being damaged that is paid in part by Plaintiff as a tax payer.

Defendant-B and C are incorporated as codefendants as each is an equal partner who is responsible for the damage done to Plaintiff's vehicles and to the damage done to fire and police vehicles where Plaintiff is in part financially responsible for.

Maxims of Law say people in a contract are one and each can be held responsible.

On August 22, 2022 Plaintiff sent a NOTICE OF DEMAND to Defendant-A to give Defendant-A an opportunity to begin fixing the railways in Saginaw County, Plaintiff gave Notice for 28 days.

Defendant and its partners, Defendant-B and C have had plenty of time to fix the railways but has fraudulently neglected to begin fixing the railways which is causing damage to

Plaintiff's car every time he drives over a railway in Saginaw and it is costing Plaintiff higher taxes every year because fire and police drive extremely fast over the defective railways causing maximum damage to the vehicles.

**V. CIVIL CLAIM**

1. Plaintiff incorporates by reference the civil claim in the proceeding paragraphs:

**COUNT I**

**FRAUDULENTLY NEGLECTING TO FIX THE RAILWAYS IN SAGINAW  
COUNTY THAT CAUSED DAMAGE TO PLAINTIFF'S VEHICLES**

2. Defendant-A knowingly knows it received a NOTICE OF DEMAND to fix the railways in Saginaw County Michigan on August 22, 2022 and Defendant-A was given 28 days to fix the railways in Saginaw County Michigan. (See Exhibits A, B, C, and D)
3. Defendants knowingly know they are not fixing the railways in Saginaw County Michigan. (See Exhibit-A and B)
4. Defendants fraudulently neglected to fix the railways in Saginaw County on September 24, 2022 and every day thereafter. (See Exhibit A, B, C, and D)
5. Plaintiff has damaged two vehicles since he moved to Saginaw from being forced to travel over the railways to travel to grocery stores, doctors and/or to see family and friends. (See Exhibit-A and B)
6. Plaintiff DEMANDS a full and total RELIEF of \$200,000.00 (Two Hundred Thousand Dollars) from Defendant-A civilly, fraudulently, neglectfully, corporately, personally, and tortuously, with an annual interest rate of 13%, compounded each month with 1% from the time of filing the Summons and Complaint for personal, special and private damages,

and

Plaintiff DEMANDS a full and total RELIEF of \$75,000.00 (Seventy-Five Thousand Dollars) from Defendant-B civilly, fraudulently, neglectfully, corporately, personally, and tortuously, with an annual interest rate of 13%, compounded each month with 1% from the time of filing the Summons and Complaint for personal, special and private damages,

and

Plaintiff DEMANDS a full and total RELIEF of \$75,000.00 (Seventy-Five Thousand Dollars) from Defendant-C civilly, fraudulently, neglectfully, corporately, personally, and tortuously, with an annual interest rate of 13%, compounded each month with 1% from the time of filing the Summons and Complaint for personal, special and private damages.

**VI. EXTRA-ORDINARY RELIEF**

- A. Plaintiff DEMANDS a full and total EXTRA- ORDINARY RELIEF of \$5,000,000.00 (Five Million Dollars) from Defendant-A governmentally, civilly, severally, corporately, personally, strictly, and tortuously, with an annual interest rate of 13%, compounded each month with 1% from the time of filing the Summons and Complaint for personal, special and private damages and,
- B. Plaintiff DEMANDS a full and total EXTRA-ORDINARY RELIEF of \$75,000.00 (Seventy-Five Thousand Dollars) from Defendant-B civilly, severally, corporately, personally, strictly, and tortuously, with an annual interest rate of 13%, compounded each month with 1% from the time of filing the Summons and Complaint for personal, special and private damages and,
- C. Plaintiff DEMANDS a full and total EXTRA-ORDINARY RELIEF of \$75,000.00 (Seventy-Five Thousand Dollars) from Defendant-C civilly, severally, corporately, personally, strictly, and tortuously, with an annual interest rate of 13%, compounded each month with 1% from the time of filing the Summons and Complaint for personal, special and private damages.



Patrick-Joseph Groulx  
2070 Houlihan Road  
Saginaw Michigan [48601]  
989 860-2550  
mr.288074@yahoo.com

9-27-2022  
Date

Exhibit  
A

**AN AFFIDAVIT OF TRUTH BY Patrick-Joseph: Groulx**

NOW COMES Affiant, Patrick-Joseph: Groulx with an Affidavit of Truth.

Affiant incorporates all the facts, truths and declarations in the preceding paragraphs:

- A. **I, Patrick-Joseph: Groulx** am competent for stating the matters set forth here with.
- B. **I, Patrick-Joseph: Groulx** have personal knowledge concerning the facts stated herein.
- C. All the facts stated herein are true, correct, complete, and certain, not misleading, admissible as evidence, and if stating **I, Me, Myself**, and One Patrick-Joseph: Groulx shall so state:

I can avoid a bad road like Mackinaw Street to get to the grocery store or see doctors or see family and friends, but I cannot avoid a railroad track in Saginaw County.

I cannot afford to payout to fix another vehicle, driving in Saginaw over the train tracks is a severe financial burden that CSX is responsible for.

CSX Corporation owes me a new vehicle every 3-5 years if they are not going to fix the tracks in Saginaw County in and for Michigan.

I have lost a Ford Explorer that initially cost Carol Groulx and I about \$20,000.00 and to fix it over and sometimes costs to fix suspension were upwards around \$25,000.00.

Paying to replace suspension on the front and back of a vehicle is expensive.

After damage kept happening to the Ford Explorer I had to junk the car and sell it for \$500.00.

When I got a 2005 Volvo the suspension and sway bars were in great condition since the car came from Midland County where train tracks are smooth to drive over, same goes with Bay County 75% of the tracks in Bay County are smooth to travel over.

After now several years of replacing broken sway bars, I am tired of having to replace the sway bars and have the suspension fixed year after year.

I am wondering why my taxes are always going up, I understand now when the fire and police travel at extreme speeds for emergencies they are maximizing the damage done to those vehicles as they travel over very poorly maintained railways.

I sent CSX a notice of demand on August 22, 2022 and gave CSX 28 days to begin working on any track that crosses a road in Saginaw County and on September 24, 2022 I have not seen any type of work on any tracks that cross any road in Saginaw County.

Why should I be burdened financially to fix or repair any damage done to the Volvo or any future vehicle that I acquire when I know it is CSX's responsibility to fix and/or repair the railways in Saginaw County?

- D. If any living soul has information that will controvert and overcome this Declaration, since this a commercial matter, please advise me IN WRITING by DECLARATION/AFFIDAVIT FORM, under your unlimited commercial liability, including but not limited to the pains and penalties of perjury, within 15 regular business days providing me with your counter Declaration/Affidavit, proving with particularity by stating all requisite actual evidentiary fact(s) and all requisite actual law, and not merely the ultimate facts and law conclusions that this affidavit by Declaration is substantially and materially my or the fiction's status and factual declaration.
- E. Your silence stands as consent, and tacit approval, for the factual declarations here being established as fact as a law matter and this affidavit by Declaration will stand as evidence against you.

**Plain Statement of Facts**

I declare that the statements above are true to the best of my information, knowledge, and belief.

Patrick-Joseph: Groulx 9-26-2022  
Patrick-Joseph: Groulx Date  
2070 Houlihan Road  
Saginaw Michigan  
989 860-2550

**JURAT**

SAGINAW COUNTY )  
)  
MICHIGAN STATE )

Subscribed and affirmed before me this 26 day for the September month in the year of our Primal Creator, Two Thousand and Twenty-Two (2022), A.D.

Steven Ahler  
Notary

1115 S. Washington Ave. Saginaw, MI 48601 Seal  
Address of notary

8/31/2026  
My notary expires

STEVEN AHLER  
NOTARY PUBLIC - MICHIGAN  
SAGINAW COUNTY  
MY COMMISSION EXPIRES 08/31/2026  
ACTING IN Saginaw COUNTY

Exhibit B

**AN AFFIDAVIT OF TRUTH BY Carol Jean Groulx**

NOW COMES Affiant, Carol Jean Groulx with an Affidavit of Truth.

Affiant incorporates all the facts, truths and declarations in the preceding paragraphs:

- A. **I, Carol Jean Groulx** am competent for stating the matters set forth here with.
- B. **I, Carol Jean Groulx** have personal knowledge concerning the facts stated herein.
- C. All the facts stated herein are true, correct, complete, and certain, not misleading, admissible as evidence, and if stating **I, Me, Myself**, and One Carol Jean Groulx shall so state:

I have no choice to drive over the train tracks in Saginaw County to go grocery shopping, go to doctor visits, and go see family and friends.

I can avoid a bad road, but rail road tracks are impossible to avoid.

Every time I drive over the tracks the vehicle I am driving takes a beating, the front and back suspension, sway bars, shocks with coils and the front end and back end of my Eddie Bauer ford explorer kept on getting damaged so after fixing it several times I trashed the vehicle.

In 2020 I purchased a 2005 Volvo and now the sway bars and the suspension of the front and back of the Volvo is damaged from driving over the train tracks in Saginaw County

Every time the car gets damaged it costs Patrick-Joseph: Groulx and I quite a bit of money sometimes around \$20,000.00.

When Patrick-Joseph: Groulx and I purchased a 2005 Volvo, we expect over time to replace sway bars, but every year, that is a serious problem, and have the front and back suspension fixed yearly as well is an issue with driving over bad train tracks.

The train tracks near St Mary's Hospital in Saginaw Michigan is one of the worst tracks a person can go over, this is just one track that need to be replaced.

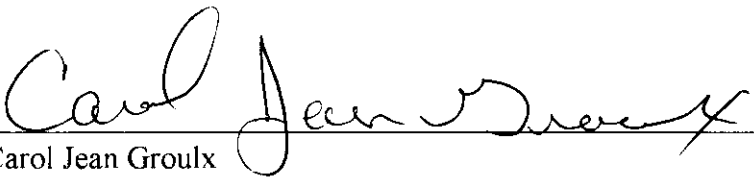
Every train track that I drive over no matter if I drive slow or crawl over the tracks, the car bounces up and down putting extreme stress on the tires, sway bars, coils, and the front and back suspension.

At the time of signing this affidavit, there is no work being done on any rail road tracks in Saginaw County Michigan.

- D. If any living soul has information that will controvert and overcome this Declaration, since this a commercial matter, please advise me IN WRITING by DECLARATION/AFFIDAVIT FORM, under your unlimited commercial liability, including but not limited to the pains and penalties of perjury, within 9 business days (15 regular days) providing me with your counter Declaration/Affidavit, proving with particularity by stating all requisite actual evidentiary fact(s) and all requisite actual law, and not merely the ultimate facts and law conclusions that this affidavit by Declaration is substantially and materially my or the fiction's status and factual declaration.
- E. Your silence stands as consent, and tacit approval, for the factual declarations here being established as fact as a law matter and this affidavit by Declaration will stand as evidence against you.

**Plain Statement of Facts**

I declare that the statements above are true to the best of my information, knowledge, and belief.

  
\_\_\_\_\_  
Carol Jean Groulx  
2070 Houlihan Road  
Saginaw Michigan 48601  
989 860-2550

9-26-22  
Date

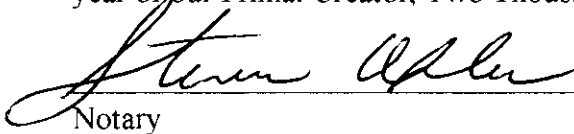
**JURAT**

SAGINAW COUNTY )

)

MICHIGAN STATE )

Subscribed and affirmed before me this 26 day for the Saginaw month in the year of our Primal Creator, Two Thousand and Twenty-Two (2022), A.D.

  
Notary

1115 S. Washington, Saginaw, MI 48601 Seal  
Address of notary

8/31/2026  
My notary expires

STEVEN AHLER  
NOTARY PUBLIC - MICHIGAN  
SAGINAW COUNTY  
MY COMMISSION EXPIRES 08/31/2026  
ACTING IN Saginaw COUNTY

NOTICE OF DEMAND

Patrick-Joseph: Groulx  
2070 Houlihan Road  
Saginaw Michigan

Exhibit  
C

CSX TRANSPORTATION aka CSX,  
Attn: Legal Department

I am writing this NOTICE OF DEMAND asking that CSX Transportation, **fix the railroad tracks in Saginaw County Michigan you have 28 days** from receiving this letter by priority mail with tracking to begin fixing the tracks and finish in 60 days from receiving the notice of demand.

Failure to fix the tracks in Saginaw County will constitute a law suit against you in federal court for neglecting to fix the railroads which caused damage to my vehicle.

Thank You

Date: August 22, 2022

Patrick-Joseph: Groulx  
2070 Houlihan Road  
Saginaw Michigan [48601]  
mr.288074@yahoo.com  
989 860-2550



SAGINAW  
1233 S WASHINGTON AVE  
SAGINAW, MI 48601-2517  
(800)275-8777

Exhibit  
D

08/22/2022 12:16 PM

Product	Qty	Unit Price	Price
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Priority Mail® Window FR Env	1		\$8.95
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Jacksonville, FL 32202

Flat Rate

Expected Delivery Date

Thu 08/25/2022

Tracking #:

9505 5107 4361 2234 5487 05

Insurance \$0.00

Up to \$100.00 included

Total \$8.95

Grand Total: \$8.95

Debit Card Remit \$8.95

Card Name: Debit Card

Account #: XXXXXXXXXXXX5857

Approval #: 901484

Transaction #: 159

Receipt #: 033357

Debit Card Purchase: \$8.95

\*\*\*\*\*  
Every household in the U.S. is now  
eligible to receive a third set  
of 8 free test kits.  
Go to [www.covidtests.gov](http://www.covidtests.gov)  
\*\*\*\*\*

Text your tracking number to 28777 (2USPS)  
to get the latest status. Standard Message  
and Data rates may apply. You may also  
visit [www.usps.com](http://www.usps.com) USPS Tracking or call  
1-800-222-1811.

Save this receipt as evidence of  
insurance. For information on filing an  
insurance claim go to  
<https://www.usps.com/help/claims.htm>  
or call 1-800-222-1811

Preview your Mail  
Track your Packages  
Sign up for FREE @  
<https://informedelivery.usps.com>

All sales final on stamps and postage.  
Refunds for guaranteed services only.  
Thank you for your business.

Tell us about your experience.  
Go to: <https://postalexperience.com/Pos>  
or scan this code with your mobile device



or call 1-800-410-7420.

**USPS Tracking®**

Exhibit  
O cont.

FAQs >

Tracking Number:

Remove X

**9505510743612234548705**

Copy

Add to Informed Delivery

(<https://informedelivery.usps.com/>)

## Latest Update

Your item was picked up at a postal facility at 7:52 am on August 24, 2022 in JACKSONVILLE, FL 32206.

### Delivered

**Delivered, Individual Picked Up at Postal Facility**

JACKSONVILLE, FL 32206

August 24, 2022, 7:52 am

### Out for Delivery

JACKSONVILLE, FL 32202

August 24, 2022, 6:10 am

### Arrived at Post Office

JACKSONVILLE, FL 32208

August 24, 2022, 4:25 am

### Arrived at USPS Facility

JACKSONVILLE, FL 32208

August 24, 2022, 4:09 am

### Departed USPS Regional Facility

JACKSONVILLE FL DISTRIBUTION CENTER

August 24, 2022, 3:57 am

### Arrived at USPS Regional Facility

JACKSONVILLE FL DISTRIBUTION CENTER

August 24, 2022, 3:27 am

Feedback

● **Departed USPS Facility**

JACKSONVILLE, FL 32218  
August 24, 2022, 3:09 am

● **Arrived at USPS Regional Destination Facility**

JACKSONVILLE FL PACKAGE SORTING CENTER  
August 24, 2022, 1:46 am

● **Departed USPS Regional Origin Facility**

DETROIT MI NETWORK DISTRIBUTION CENTER  
August 23, 2022, 12:39 am

● **Arrived at USPS Regional Origin Facility**

DETROIT MI NETWORK DISTRIBUTION CENTER  
August 23, 2022, 12:02 am

● **Departed Post Office**

SAGINAW, MI 48601  
August 22, 2022, 5:33 pm

● **USPS in possession of item**

SAGINAW, MI 48601  
August 22, 2022, 12:15 pm

● **Hide Tracking History**

Feedback

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**Text & Email Updates**



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**USPS Tracking Plus®**



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**Product Information**



**See Less** ^

Track Another Package

Enter tracking or barcode numbers

**Need More Help?**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

Patrick-Joseph: Groulx

## DEFENDANTS

CSX CORPORATION, QUALITY DISTRIBUTION, AND NORFOLK SOUTHERN

(b) County of Residence of First Listed Plaintiff Saginaw  
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant Duval

(c) Attorneys (Firm Name, Address, and Telephone Number)

Patrick-Joseph: Groulx, 2070 Houlihan Road Saginaw Michigan, 989 860-2550 (P00000)

1:22-cv-12296

Judge: Ludington, Thomas L.

MJ: Morris, Patricia T.

Filed: 09-27-2022

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP

(For Diversity Cases Only)

- |   | PTF                                   | DEF                        |   | PTF                        | DEF                                   |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State                   | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4            |
| Citizen of Another State                | <input type="checkbox"/> 2            | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6            |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 119 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HHA (13950) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable Sat TV <input type="checkbox"/> 850 Securities/Commodities Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

## V. ORIGIN (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

28 USC 1332

Brief description of cause:

Fraudulently Neglecting to fix the railroad tracks that caused damage to Plaintiff's Vehicle

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$ 350,000.00

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE:

DOCKET NUMBER

DATE  
September 26, 2022

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG JUDGE

SIGNATURE OF ATTORNEY OF RECORD:  
Patrick-Joseph: Groulx

1. Is this a case that has been previously dismissed?

☐ Yes

☒ No

If yes, give the following information:

Court: \_\_\_\_\_

Case No.: \_\_\_\_\_

Judge: \_\_\_\_\_

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

☐ Yes

☒ No

If yes, give the following information:

Court: \_\_\_\_\_

Case No.: \_\_\_\_\_

Judge: \_\_\_\_\_

Notes :

\_\_\_\_\_

\_\_\_\_\_